

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

RIVERVIEW FARMS, <i>et al.</i>	)	
	)	
Plaintiffs,	)	
	)	No. 18-cv-1099 L
v.	)	
	)	Judge Richard A. Hertling
UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	
	)	

---

**UNITED STATES' UNOPPOSED MOTION TO EXTEND THE RESPONSE DEADLINE  
TO PLAINTIFFS' MOTION FOR LEAVE TO FILE THIRD AMENDED COMPLAINT**

Pursuant to Rule 6(b) of the Rules of the Court of Federal Claims, the United States respectfully moves to enlarge the time to respond to Plaintiffs' Renewed Motion for Leave to File Third Amended Complaint, ECF No. 160, by 21 days to **December 18, 2024**. Plaintiffs filed their motion on October 30, 2024, and the United States' opposition is currently due November 27, 2024. This is the United States' first request for an enlargement of this deadline. Plaintiffs do not oppose this request.

Under RCFC 6(b), the Court may, for good cause, extend a party's deadline to perform a required action. Here, good cause exists because counsel for the United States have significant caseloads on other matters, including a recent trial, as was previewed to the court at the June 27, 2024 hearing, as well as other oral arguments and filing deadlines. In addition, the United States did not oppose Plaintiffs' request for extension to file their motion, in part because Plaintiffs agreed that they would not oppose a similar extension for the United States. Pls.' Unopposed Mot. for Extension of Briefing Sched. 2 ¶ 5, ECF No. 158. Therefore, for good cause shown, the United States moves to extend the deadline for its response by 21 days to December 18, 2024. Under the timing set by the Court's Order, ECF No. 159, Plaintiffs' reply would in turn be due January 2, 2025.

Respectfully submitted on November 20, 2024,

TODD KIM  
Assistant Attorney General  
United States Department of Justice  
Environment and Natural Resources Division

*s/Laura W. Duncan*  
LAURA W. DUNCAN  
United States Department of Justice  
Environment and Natural Resources Division  
c/o USACE Galveston District Office of  
Counsel  
2000 Fort Point Road, Room 321  
Galveston, Texas 77550  
Telephone: (202) 598-1114  
E-mail: Laura.Duncan@usdoj.gov

*Attorney of Record for the United States*